

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FAIRFIELD SENTRY LIMITED, *et al.*,

Debtors in Foreign Proceedings.

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), *et al.*,

Plaintiffs,

v.

THEODOOR GGC AMSTERDAM, *et al.*,

Defendants.

FAIRFIELD SENTRY LIMITED (IN
LIQUIDATION), *et al.*,

Plaintiffs,

v.

ABN AMRO SCHWEIZ AG, *et al.*,

Defendants.

FAIRFIELD SENTRY LIMITED (IN
LIQUIDATION), *et al.*,

Plaintiffs,

v.

ABN AMRO SCHWEIZ AG, *et al.*,

Defendants.

: Chapter 15

: Case No. 10-13164 (CGM)

: Jointly Administered

: Adv. Pro. No. 10-03496 (CGM)

: Administratively Consolidated

: Adv. Pro. No. 10-03635 (CGM)

: Adv. Pro. No. 10-03636 (CGM)

**JOINDER OF CERTAIN DEFENDANTS TO HSBC DEFENDANTS’
(1) OBJECTION TO LIQUIDATORS’ PROPOSED SCHEDULING ORDER
ON PERSONAL JURISDICTION BRIEFING AND DISCOVERY AND
(2) NOTICE OF COUNTER-PROPOSED ORDER**

Corner Banca SA, Finter Bank Zurich (n/k/a Bank Vontobel AG), Privatbank IHAG Zurich AG (sued as IHAG Handelsbank AG), and PKB Privatbank AG (collectively, the “WilmerHale Defendants”), by and through their undersigned counsel, hereby respectfully join in: (i) the *HSBC Defendants’ (1) Objection to Liquidators’ Proposed Scheduling Order on Personal Jurisdiction Briefing and Discovery and (2) Notice of Counter-Proposed Order* (ECF No. 3884¹) (the “HSBC Objection”) to the *Notice of Filing and Presentment of Scheduling Order on Personal Jurisdiction Briefing and Discovery* (the “Liquidators’ Proposed Order”) filed by the Liquidators on September 23, 2021 at ECF No. 3883; and (ii) the HSBC Defendants’ counter-proposed order accompanying the HSBC Objection (ECF No. 3884-1) (the “HSBC Defendants’ Proposed Order”).

The WilmerHale Defendants intend to move to dismiss the complaints in the above-captioned adversary proceedings (the “Complaints”) for lack of personal jurisdiction, and specifically intend to establish in their briefing that the Complaints do not allege a *prima facie* case for personal jurisdiction over the WilmerHale Defendants.

¹ Unless otherwise noted, references to “ECF No. ___” are to entries in Adv. Pro. No. 10-03496.

For the reasons set forth in the HSBC Objection, the WilmerHale Defendants object to the Liquidators' Proposed Order, and respectfully request that the Court enter the HSBC Defendants' Proposed Order.

Dated: September 28, 2021
New York, New York

Respectfully submitted,

**WILMER CUTLER PICKERING
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